

REMARKS

The allowability of Claims 18, 20 and 21 was withdrawn in view of new rejections present. Claims 18, 20 and 21 were rejected under 35 USC 103(a) as being unpatentable over Allaire et al. (US 5,303,861) in view of Sutton (US 4,648,298) and further in view of Sosnowski (US 6,136,861).

The Applicant respectfully traverses the Examiner's rejections and requests reconsideration. The Examiner's rejections appear to be simplified down to:

Sutton = Shearing a circuit board

+Allair = Torque breaking plate glass

+Sosnowski = Electrical shielding of electrical components

= the claimed invention of Torque loading a multi-board array onto a splitting element by way of loading a shield element.

The Applicant respectfully traverses this argument. No motivation has been provided in any of the references, either alone or in combination, for torque loading a multi-board array such that a pre-scored plane is forced onto a splitting element. Torque loading plate glass provides no such motivation as asserted throughout this prosecution. Of course glass is broke in this fashion, shearing is not feasible for glass structures. Similarly, torque loading a multi-board array was not (prior to this application) a practical methodology for separating circuit boards as the flex would loosen component connections and damage the board. The present invention, however, provided a unique method and apparatus for doing just that, which is neither taught nor alluded to in any of the references either alone or in combination.

Secondly, the Applicant respectfully disagrees with the Examiner's assertions with regard to Sosnowski. The Sosnowski reference teaches a shield with a removable top. Neither Sosnowski, nor any other reference, teaches loading such a shield to induce torque by which to separate circuit boards.

Furthermore, the shield taught by Sosnowski is purposely taught to have a top surface that is scored such that it may be easily removed by hand. Such an easily broken top surface hardly provides motivation to load such a shield to induce torque. It is counterintuitive to apply such loading to Sosnowski lest the upper surface wind up crushed onto the components. But most significantly, it is illustrative of the complete lack of a proper motivation to combine as is absent from all of the collection of cited references.

In light of the arguments presented and the lack of proper motivation found in the cited references, the Applicant respectfully seeks reconsideration from the Examiner.

CONCLUSION

The application is now in condition for allowance and expeditious notice thereof is earnestly solicited.

Should the Examiner have any questions or comments that would place the application in better condition for allowance, the Examiner is respectfully requested to call the undersigned attorney.

The Examiner is authorized to charge any fees required to Deposit Account No. 50-0476.

Respectfully submitted,



Thomas Donohue
Reg. No. 44,660
Artz & Artz, P.C.
28333 Telegraph Road, Suite 250
Southfield, MI 48034
(248) 223-9500
(248) 223-9522 (Fax)

Dated: May 10, 2006